

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA **4: CR 22 95**
v. : (Judge)
JOSE WILLIAM PEREZ FELIPE and : **JUDGE BRANN**
WILBER SORI SAN MIGUEL, :
Defendants :

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
18 U.S.C. § 371
(Conspiracy)

FILED
WILLIAMSPORT
MAR 10 2022
PER
DEPUTY CLERK

From on or about November 29, 2021, and continuing through in
or around December 2, 2021, in Centre County, within the Middle
District of Pennsylvania, and elsewhere, the defendants,

**JOSE WILLIAM PEREZ FELIPE and
WILBER SORI SAN MIGUEL,**

did knowingly and willfully combine, conspire, confederate, and agree
with each other, and with other persons, known and unknown, to
commit offenses against the United States, specifically: to unlawfully
transport and transfer, and cause to be transported and transferred, in

interstate and foreign commerce, stolen goods, wares and merchandise, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

The Manner and Means of the Conspiracy

It was part of the conspiracy that:

1. The conspirators traveled to Pennsylvania from Kentucky in a Ford van carrying a load of approximately 30 stolen catalytic converters and power cutting tools, cutting blades, hand tools, and other equipment used to remove catalytic converters from motor vehicles.
2. While en route to New York to sell the stolen catalytic converters, the conspirators stopped in Ohio and Centre County, Pennsylvania to steal and obtain additional catalytic convertors.
3. During their travels in Centre County, the conspirators used power cutting tools and other equipment to steal approximately six additional catalytic converters from vans and box trucks at three separate commercial and institutional locations in State College.
4. The conspirators used the geolocation features of cellular

telephones to search for businesses and institutions likely to have vans and trucks from which they could steal catalytic converters.

5. The conspirators used Facebook to identify and communicate with individuals who bought and sold stolen catalytic converters.

6. The conspirators planned to take the stolen catalytic converters from Kentucky, Ohio, and Pennsylvania to a location in New York where the valuable metals contained inside the converters, including rhodium, palladium, and platinum, would be extracted.

Overt Acts of the Conspiracy

In furtherance of the conspiracy, the defendants committed and caused the commission of overt acts, in the Middle District of Pennsylvania and elsewhere, including but not limited to the following:

1. On or about November 29, 2021, the defendants received approximately 22 stolen catalytic converters in Louisville, Kentucky from persons unknown to the grand jury.

2. On or after November 29, 2021, the defendants transported the stolen catalytic converters in a green Ford van from Louisville to Indiana and Ohio.

3. On or after November 29, 2021, while traveling in the area of Cleveland, Ohio, they enlisted a person unknown to the grand jury to steal two catalytic converters from trucks in the vicinity of the motel where they were staying overnight, in exchange for cash and marihuana.

4. After receiving the additional catalytic converters in the Cleveland, Ohio area the defendants put them inside the Green Ford van and traveled to Pennsylvania.

5. On or about December 1, 2021, the defendants arrived in State College where they used the geolocation features on their phones to search for business and other locations that would have trucks and vans with catalytic converters for them to steal.

6. On or about December 1, 2021, the defendants traveled in the green Ford van to a business in State College where they used a reciprocating saw to cut off a catalytic converter on a Ford Super Duty diesel box truck.

7. On or about December 1, 2021, the defendants traveled in the green Ford van to another, nearby business in State College where

they used a reciprocating saw to cut off two catalytic converters on an Isuzu box truck.

8. On or about December 2, 2021, the defendants traveled in the green Ford van to a service garage parking lot on the campus of the Pennsylvania State University (PSU) where they used a reciprocating saw to cut off three catalytic converters from three PSU Office of Physical Plant vans parked in the garage parking lot.

9. After stealing the catalytic converters from PSU and the two businesses in State College, the defendants placed the stolen catalytic converters inside the green Ford van.

10. On or about December 2, 2021, after stealing the six catalytic converters from the vehicles in State College, the defendants parked the green Ford van in the PSU parking garage where they rested and slept.

11. The Grand Jury incorporates herein Count Two as an additional overt act in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 371.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 2314

(Interstate Transportation
of Stolen Property)

From on or about November 29, 2021, to on or about December 2, 2021, within the Middle District of Pennsylvania, and elsewhere, the defendants,

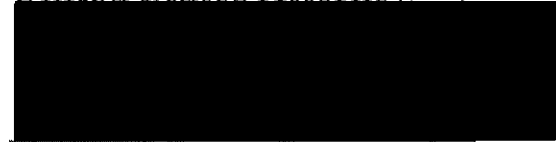
**JOSE WILLIAM PEREZ FELIPE and
WILBER SORI SAN MIGUEL,**

did unlawfully transport and transfer, and cause to be transported and transferred, in interstate and foreign commerce from the Commonwealth of Kentucky and the state of Ohio to the Commonwealth of Pennsylvania, stolen goods, wares and merchandise, that is, 30 catalytic converters inside a green Ford van, with a total value of approximately \$90,000, knowing the same to have been stolen, converted, and taken by fraud, and did aid and abet the commission of that offense.

All in violation of Title 18, United States Code, Sections 2314 and

2.

JOHN C. GURGANUS
United States Attorney



GEORGE J. ROCKTASHEL
Assistant United States Attorney

A TRUE BILL



FOREPERSON

3/10/2022
Date